

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
DONNA GAVIN)	
)	
Plaintiff,)	
)	C. A. No. 1:18-cv-10819-LTS
v.)	
)	
CITY OF BOSTON and MARK)	
HAYES,)	
)	
Defendants.)	
_____)	

**JOINT MOTION TO SET DEADLINES FOR
DAUBERT MOTIONS AND MOTIONS IN LIMINE**

Pursuant to the Court’s August 20, 2021 Order (Docket No. 135), Plaintiff Donna Gavin (“Plaintiff”) and the Defendants City of Boston and Mark Hayes (collectively, the “Parties”), jointly request that the Court set deadlines related to the filing of *Daubert* motions and substantive motions *in limine*. Furthermore, the Parties request that the deadline for motions *in limine* set forth in the Order Setting Case for Trial (Docket No. 132) be adjusted. Having conferred as to their respective schedules, the Parties request that the Court enter the following deadlines:

1. *Daubert* motions challenging any of Plaintiff’s designated experts shall be filed on or before September 15, 2021. Plaintiff shall have 14 days to file oppositions to the *Daubert* motions.
2. Any substantive motions *in limine* shall be filed by September 24, 2021, with oppositions due within 14 days.

3. Any motions *in limine* challenging proposed witnesses, proposed trial exhibits, or other evidentiary issues shall be filed by September 29, 2021, with oppositions due within 14 days.¹

WHEREFORE, the Parties jointly request that this Court set the deadlines requested herein.

Respectfully submitted,

DONNA GAVIN

CITY OF BOSTON

By her attorneys,

By its attorneys,

Henry C. Luthin
Corporation Counsel

/s/ Lucia A. Passanisi

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MARK HAYES

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Dated: August 27, 2020

¹ This is intended to reset the deadline in the Order Setting Case for Trial which provides for an October 8, 2021 filing date for motions *in limine*. (Docket No. 132, pg. 6.)

CERTIFICATE OF SERVICE

I, Lucia A. Passanisi, Esq., hereby certify that the foregoing document was filed through the ECF system and will therefore be sent electronically to all counsel of record as identified on the Notice of Electronic Filing (NEF).

/s/ Lucia A. Passanisi

Lucia A. Passanisi